

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

DARRYL ANDERSON, et. al., §
§
Plaintiffs, § **CIVIL ACTION NO.**
v. § **1:06-cv-01000-MEF-WC**
§
PERDUE FARMS INC., §
§
Defendant. §

**NOTICE OF FILING ADDITIONAL
NOTICES OF CONSENT TO JOIN**

Plaintiffs give notice of filing the attached Notices of Consent to Join executed by, STACEY GOSS, CLIFTON ENOCH, BRAMY JONES, EVELYN T. REESE, JESTEAN REESE, QUEEN WILSON, similarly situated employees to Plaintiffs who likewise are or were subjected to the illegal pay practices at issue and who wish to join the above-captioned lawsuit.

Dated: September 30, 2007

Respectfully submitted,

THE COCHRAN FIRM, P.C.

/s/ Robert J. Camp

ROBERT J. CAMP

BERNARD D. NOMBERG

505 North 20th Street, Suite 825

Birmingham, AL 35203
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(205) 930-6910 (Fax)

– and –

Samuel A. Cherry, Jr.
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– and –

Richard B Celler
MORGAN & MORGAN, P.A.
284 South University Drive
Fort Lauderdale, FL 33324
(954) 318-0268 (Phone)
(954) 333-3515 (Fax)

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2007, I electronically filed the foregoing Notice of Filing Additional Notices of Consent to Join with the Clerk of the District Court using the CM/ECF system, which sent notification of such filing to:

Sandra B. Reiss
sandra.reiss@odnss.com

Lance Harrison Swanner
lswanner@cochranfirm.com

James J. Kelley
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Bernard D. Nomberg
bnomberg@cochranfirm.com

Brian Z. Liss
bliss@morganlewis.com

Samuel A. Cherry, Jr.
scherry@cochranfirm.com

/s/ Robert J. Camp
ROBERT J. CAMP

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Shadey Goss
[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farm at the facility located in DeWitt. I worked at this location from Sept 18 1998 to 4/27/07 Present.
[Name of Plant]
[City/State]
[Date]
[Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farm plant in DeWitt, and possibly other plants owned by Perdue Farms. If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 4/27/07 day of September, 2007

Shadey Goss
[PRINT NAME]

Shadey Goss
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Clifton Enoch

[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms at the facility located in Bethel AL. I worked at this location from 8/2003 to 9/2004.
[Name of Plant]
[City/State]
[Date]
[Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Bethel, AL, and possibly other plants owned by Perdue Farms. If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 9 day of September 2007.

Clifton Ray Enoch
[PRINT NAME]

Clifton Ray Enoch
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

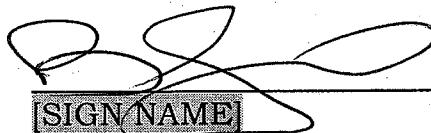
Barney Jones [Print Name] states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms [Name of plant] at the facility located in Dothan AL. I worked at this location from 5-07 [Date] to 08/2007 [Date, or if still working write "present"] FL (FL)
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Dothan AL [Name of Plant] and possibly other plants owned by Perdue Farms [Name of Plant] FL [City/State] If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 21 day of June, 2007.

Barney Jones
[PRINT NAME]


[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Evelyn T. Reese
[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms at the facility located in Dothan, AL. I worked at this location from June 4, 07 to September 4, 07.
[Name of Plant]
[City/State]
[Date]
[Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Dothan, AL, and possibly other plants owned by Perdue Farms. If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.
[Name of Plant]
[City/State]
[Name of Plant]

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 20 day of September, 2007.

Evelyn T. Reese
[PRINT NAME]

Evelyn Reese
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Jestean Reese
[Print Name]

states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms at the facility located in Dothan AL. [Name of Plant] I worked at this location from 11/2003 to 2/2005. [City/State] [Date] [Date, or if still working write "present"].
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Dothan, AL, [Name of Plant] [City/State] and possibly other plants owned by Perdue Farms. [Name of Plant] If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 19 day of September 2007.

Jestean Reese
[PRINT NAME]

Jestean Reese
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Queen Wilson [Print Name] states the following:

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms [Name of Plant] at the facility located in Dothan, AL [City/State]. I worked at this location from 4/20/05 [Date] to present [Date, or if still working write "present"].
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Dothan AL [Name of Plant] [City/State], and possibly other plants owned by Perdue Farms [Name of Plant]. If brought as a class action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 21 day of September, 2007.

Queen Wilson [PRINT NAME]

Queen Wilson [SIGN NAME]